

WILLKIE FARR & GALLAGHER LLP

1875 K Street, N.W.
Washington, DC 20006-1238

Tel: 202 303 1000
Fax: 202 303 2000

July 8, 2025

VIA ECF

The Honorable Lewis J. Liman
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, NY 10007

Date: 7/9/25

SO ORDERED.



LEWIS J. LIMAN
United States District Judge

Re: *Lively v. Wayfarer Studios LLC, et al.*, No. 1:24-cv-10049 (LJL)

Dear Judge Liman:

On behalf of Plaintiff Blake Lively, we write in connection with the request for an extension submitted by nonparties Katherine Case and Breanna Butler Koslow. *See* ECF No. 388. Ms. Lively is amenable to necessary extensions in good faith, but notes that any delay in productions may be prejudicial to Ms. Lively's forthcoming deposition on July 17—a date she intends to keep. *See* ECF No. 389-2 at 1. As of this evening, following a meet and confer this afternoon, counsel for Ms. Case and Ms. Koslow have agreed to interim or rolling production(s) prior to July 17, in keeping with their earlier offer. *See* ECF No. 389-2 at 3. With the understanding that all documents that can feasibly be produced in good faith in advance of July 17 will be produced, Ms. Lively does not oppose Ms. Case and Ms. Koslow's request for an extension to July 18 for Ms. Case and Ms. Koslow to produce the remainder of documents.

We further respectfully submit that this is just the latest example of a substantial and recurring pattern of delays in document production by both the Wayfarer Parties and their affiliated third-party witnesses in this case that necessitated the filing of the Joint Motion to Extend the Court's Case Management and Scheduling Order, as filed on July 3, 2025, and which extension of the close of fact discovery to September 30 the Wayfarer Parties do not oppose. *See* ECF Nos. 386, 394.

Respectfully submitted,

s/ Michael J. Gottlieb

WILLKIE FARR & GALLAGHER LLP
Michael J. Gottlieb
Kristin E. Bender

Willkie Farr & Gallagher
1875 K Street NW
Washington, DC 20006
(202) 303-1000
mgottlieb@willkie.com
kbender@willkie.com

Aaron E. Nathan
Willkie Farr & Gallagher LLP
787 Seventh Avenue
New York, NY 10019
(212) 728-8000
anathan@willkie.com

DUNN ISAACSON RHEE LLP
Meryl C. Governski (*pro hac vice*)
401 Ninth Street, NW
Washington, DC 20004
(202) 240-2900
mgovernski@dirllp.com

MANATT, PHELPS & PHILLIPS, LLP
Esra A. Hudson (*pro hac vice*)
Stephanie A. Roeser (*pro hac vice*)
Manatt, Phelps & Phillips LLP
2049 Century Park East, Suite 1700
Los Angeles, California 90067
(310) 312-4000
ehudson@manatt.com
sroeser@manatt.com

Attorneys for Blake Lively